

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

M.J.J.,

Plaintiff,

v.

POLK COUNTY ,
DARRYL L. CHRISTENSEN,

Defendants

Civil Action No. 15-cv-433-wmc

And

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

J.K.J.,

Plaintiff,

v.

POLK COUNTY ,
DARRYL L. CHRISTENSEN,

Defendants

Civil Action No. 15-cv-428-wmc

And

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

DECLARATION OF LIDA M. BANNINK IN SUPPORT OF PLAINTIFFS' MOTIONS *IN LIMINE*

LIDA M. BANNINK declares, pursuant to 28 U.S.C. § 1746 and under the penalty of

perjury, that the following is true and correct:

1. I am attorney licensed in the State of Wisconsin.
2. I am one of the attorneys representing Plaintiffs, M.J.J. and J.K.J., in the above-captioned matter.
3. I make this Affidavit in support of Plaintiffs' Motions *in Limine*.
4. Attached are true and correct copies of the following documents:

EXHIBIT A: Documents bates numbered PCJ 638-641 which were produced in response to Plaintiffs' Discovery request dated May 12, 2016 which outline the role of the Jail Captain at the Polk County Jail.

EXHIBIT B: Documents bates numbered DOC 515-516 and MJJ/JKJ 1843-1844 which were produced in response to an Open Records Request from the Plaintiffs to the Wisconsin Department of Justice.

EXHIBIT C: Documents bates numbered PCJ 325-329 which were produced in response to Plaintiffs Discovery Request dated May 12, 2016 from Polk County that outline an investigation into Defendant Christensen being untruthful to a superior officer.

EXHIBIT D: Documents bates numbered MJJ/JKJ 4673- 4681 which were produced from Polk County on November 18, 2016 and November 21, 2016 in response to Plaintiffs' Discovery request. The only addition to the documents as produced by Polk County is the addition of Plaintiffs' bates numbers and a "received" date stamp on one letter.

ECKBERG LAMMERS, P.C.

Dated: December 19, 2017

By: /s Lida M. Bannink
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